

Title **0115** 09/29/2022

by **Jill Kuehny** in **Capital Projects Fund (CPF)** id. 32692809
Broadband Infrastructure Program: Phase Two
Applicant Response Form

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Original Submission 09/29/2022

Please provide your name: **Jill Kuehny**

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I am providing response comments related to the following application (choose one): **KanOklaNetworks_WellingtonRural**

I am responding to the concern that this project: **Proposes to serve an area that already has service**

Please describe: **AMG/NextLink is unable to provide 100 mbps download and 20 mbps upload to ALL residential customers in the defined area as required by this grant application to be considered served.**

Please provide your response to the public comments received in the text box below:

The proposed areas are just a few feet outside of KanOkla's regulated member network, and are customers we have served for 20 years with the same fixed wireless service AMG/NextLink was awarded RDOF for. Therefore, it seems as though AMG/Nextlink has come to Kansas from Texas to duplicate the exact same service KanOkla built back in 2002. We bid against them in RDOF so that we could convert our wireless customers to fiber at that time. We dropped out at the lowest price point possible to still fit our budget to bury fiber in this high cost area.

Limits of Fixed Wireless: KanOkla has extensive fixed wireless networks and knows that AMG/NextLink is unable to reach ALL residential customers in the census blocks they were awarded through the RDOF auction. The distance, line-of-sight obstructions, topography, and limits of the technology will restrict the maximum number of customers within their reach to less than 100%, which is required within this grant application. The current AMG/NextLink customers do not receive the speeds they subscribe to in this service area. With the future demand on the networks, NextLink will not be able to meet the needs of these customers in the foreseeable future.

Life of the asset: Exposure to the elements will speed the deterioration of equipment and with no follow-up requirement to upgrade or replace equipment, there is no guarantee the life of the current NextLink network will have an asset life past 5 years. KanOkla's buried fiber optic network will protect it and produce the longevity and life of the asset for decades, plus the adjoining existing FTTH networks will share the costs of upgrading electronics and system upgrades once tied in with our existing network. The efficiencies are clearly the best option for the residential customers in the proposed funding areas.

KanOkla should be awarded the opportunity to extend our robust fiber optic, multi-gig network to the farms neighboring our current member footprint. These friends and neighbors have requested fiber connectivity for years. Living in a very rural area of Sumner County, they will never receive a robust, future-ready buried fiber network without this grant funding. AMG/NextLink only offers 100/20 which is their maximum, but is less than KanOkla's minimum of 100/100 Mbps. We build upward where AMG/NextLink maxes out. KanOkla will offer 2.5 gig to last for years, plus we have served the area for 71 years and commit to serving the area with updated electronics over the decades to keep the system modern for another century. AMG/NextLink is not a local provider and does not have the relationships with these families that KanOkla has known since the inception of the cooperative. We have served them with fixed wireless and see their smiling faces at shared school events, coffee shops, farm coop meetings, and church pews. We have shared a lifetime with these neighbors and want to bring the best technology that is offered in the world today - multi-gig fiber service.

Please provide supporting documents relative to your comments. Please submit multiple files as a ZIP file.

n/a

By submitting this form for public comment and evidence to support your comment, you are accepting responsibility for the accuracy of the information submitted and that it is true and correct to the best of your knowledge. You agree to be contacted by the Kansas Office of Broadband Development, Kansas Department of Commerce should the need arise. Furthermore, by making this submission, you understand that Kansas Department of Commerce and the Office of Broadband Development reserve the right to publicly publish your comment and evidence provided. Falsification of information will result in rejection of future public comment submissions and could result legal action. Please type your name and today's date in the text box below.

Jill Kuehny
